

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. EP-20-CR-00582-DCG
	)	
MARIA LUISA CUELLAR SANTILLAN	)	

**APPLICATION FOR AUTHORIZATION OF EXPERT SERVICES**

Comes now the Defendant, Maria Luisa Cuellar Santillan, by and through her undersigned attorney, and files this Application for Authorization of Expert Services pursuant to 18 U.S.C. § 3006A (e)(1), requesting the Court to authorize investigator services, and would show the Court the following:

I.

The undersigned was appointed to represent Ms. Cuellar on February 26, 2020, as Ms. Cuellar was financially unable to obtain the services of an attorney. Ms. Cuellar's financial condition has not improved, and she is currently out on bond. She is financially unable to obtain the services of an investigator to assist in her defense. To serve the ends of justice and to adequately prepare the instant case, the services of an investigator are necessary.

II.

Ms. Cuellar is charged with federal income tax fraud, in violation of 26 U.S.C § 7206(2). Counsel anticipates needing the assistance of a private investigator to assist in interviewing the defendant and investigating this very serious case.

III.

William Kirkpatrick is a licensed private investigator in El Paso. The undersigned has contacted Mr. Kirkpatrick with respect to this case, and Mr. Kirkpatrick would be available to work on this case.

WHEREFORE, it is respectfully requested that the Court grant this application and authorize the services requested herein.

Respectfully submitted,

By: /s/ Mary Stillinger  
MARY STILLINGER  
Texas Bar No. 19239500  
401 Boston Avenue  
El Paso, Texas 79902  
(915) 775-0705  
FAX: (915) 886-7178  
E-mail: stillingerlaw@sbcglobal.net  
Attorney for Defendant

CERTIFICATE OF SERVICE

I certify that on this 25<sup>th</sup> day of January, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to the following e-mail addresses:

John S. Johnston,  
Debra P. Kanof  
Assistant U.S. Attorneys

By: /s/ Mary Stillinger  
MARY STILLINGER